

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

AMERICAN REINSURANCE COMPANY, )  
*et al.*, )  
Plaintiffs, ) CIVIL ACTION NO:  
v. ) 05-CV-11840-MLW  
AIG, Inc. and TRENWICK AMERICA )  
REINSURANCE CORPORATION, )  
Defendants. )

**ASSENTED TO MOTION TO FILE UNDER SEAL DEFENDANT AIG, INC.'S  
RENEWED MOTION TO STAY PROCEEDINGS PENDING ARBITRATION AND  
OPPOSITION TO PLAINTIFFS' RENEWED MOTION FOR REMAND**

Defendant AIG, Inc. on behalf of its member and associated companies ("AIG, Inc.") hereby moves to file under seal the following pleading:

- **DEFENDANT AIG, INC.'S RENEWED MOTION TO  
STAY PROCEEDINGS PENDING ARBITRATION  
AND OPPOSITION TO PLAINTIFFS' RENEWED  
MOTION FOR REMAND**

AIG, Inc. respectfully requests permission to file this pleading under seal because it references material submitted in connection with a confidential arbitration between Plaintiffs American Reinsurance Company, *et al.* and AIG, Inc. In accordance with the Local Rules, AIG, Inc. respectfully requests that this pleading be impounded until the final resolution of this litigation between the parties, at which time it will be retrieved by counsel for AIG, Inc. The Plaintiffs have assented to this request.

WHEREFORE, it is respectfully requested that the Court grant this assented-to motion to file the above-described document under seal.

**Certification Pursuant to Local Rule 7.1**

AIG, Inc.'s counsel certifies that pursuant to Local Rule 7.1, counsel for AIG, Inc. and the Plaintiffs have conferred regarding the issue presented by this motion, and Plaintiffs' counsel assented to this motion.

**AIG, Inc. on behalf of its member and associated companies,**

By its attorneys,

*/s/ John T. Harding*

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Dated: January 19, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on January 19, 2006.

*/s/ John T. Harding*

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John T. Harding, Jr. BBO #221270